

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**In the Matter of:**

**Chapter 13**

**CHRISTOPHER ANDREW WRIGHT,**

**Debtor.**

**Case No. 15-32876 BEH**

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**OBJECTION TO TRUSTEE'S MOTION TO DISMISS AND NOTICE OF HEARING**

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Now comes the above named Debtor, by and through Michelson Law Office, and objects to the Trustee's Motion to Dismiss on the following grounds:

FIRST: Christopher Wright filed his Chapter 13 Petition on November 25, 2015.

SECOND: Debtor admits that he has missed Trustee payments.

THIRD: Debtor had an accident in Ohio while driving his semi truck, then his fiancée passed away suddenly.

FOURTH: Debtor has deposited sufficient money in The Michelson Law Office Trust account for 3 plan payments.

FIFTH: Debtor will file a modified feasible plan.

**PLEASE TAKE NOTICE** that a telephone hearing will be held before the Honorable Beth E. Hanan, United States Bankruptcy Judge on March 29, 2016 at 9:00 AM, to consider the Trustee's Motion to Dismiss. To appear by telephone, you must call the Court conference line at 1-888-808-6929, access code 9122579 before the scheduled hearing time. Please note the Court may already be in session, so please wait quietly on the telephone for your case to be called. The Debtor is welcome, but not required to participate in this hearing,

Dated: March 7, 2016

**THE MICHELSON LAW OFFICE**

By /s/ Carrie R. Michelson

THE MICHELSON LAW OFFICE

617 6<sup>th</sup> Street/P.O. Box 67  
Racine, WI 53401-0067  
Telephone: 262-638-8400  
Fax: 262-638-1818

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**CERTIFICATE OF SERVICE**

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**STATE OF WISCONSIN)**

**: ss.**

**COUNTY OF RACINE )**

Lila Bannister, being first duly sworn on oath deposes and states that on the date this was notarized a copy of:

**OBJECTION TO TRUSTEE'S MOTION TO DISMISS  
and  
NOTICE OF HEARING**

was served by either Electronic Case Filing or by first class mail, postage prepaid, to the following persons at the following addresses:

Mary Grossman  
Chapter 13 Trustee  
P. O. Box 510920  
Milwaukee, WI 53203

U. S. Trustee  
UNITED STATES COURTHOUSE  
517 E. Wisconsin Ave.  
Suite 560  
Milwaukee, WI 53202

Christopher Wright  
673 Fox Tree Circle, #4  
Burlington, WI 53105

with a request to the postal authorities for the return thereof in case of non-delivery to the person(s) addressed, in accordance with Bankruptcy Rule 7004(b).

/s/ Lila Bannister  
Lila Bannister

March 7, 2016

/s/ Carrie R. Michelson  
Notary Public, Racine County, WI  
My commission is permanent.